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February 28, 2020

VIA ECF, ELECTRONIC MAIL & HAND DELIVERY

Hon. Vernon S. Broderick, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, NY 10007 The Letter-Motion at ECF No. 810 to seal portions of the documents filed at ECF No. 811 is GRANTED. The Letter-Motion filed at ECF No. 811 shall remain under seal only visible to the selected parties. **SO ORDERED**:

Vernon S. BRODERICK 3/3/2020

UNITED STATES DISTRICT JUDGE

Re: *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig.*, MDL No. 2542; Master Docket No. 1:14-md-02542-VSB: Request to File Under Seal

Dear Judge Broderick:

I write as counsel for Plaintiffs TreeHouse Foods, Inc., Bay Valley Foods, LLC, and Sturm Foods, Inc. (collectively, "TreeHouse") and in accordance with Your Honor's Individual Rules & Practices in Civil Cases 1.A and 5.B to request leave to file under seal limited portions of Plaintiffs' Objection to Magistrate Judge Ruling, ECF No. 750 and exhibits 1, 2, 3, 4, 6, 7, 8, 9, 10, and 11 thereto, which will be filed today, February 28, 2020, by TreeHouse and Plaintiff JBR, Inc. d/b/a Rogers Family Company (together with TreeHouse, "Plaintiffs").

Specifically, a portion of Plaintiffs' Objection refers to information that has been designated as "Highly Confidential" by Defendant Keurig Green Mountain, Inc. ("KGM") pursuant to the Stipulated Protective Order that was entered in this case on June 6, 2014. That designated information is highlighted in yellow. Accordingly, Plaintiffs ask that the Court order redaction of that information. Similarly, KGM has designated portions of exhibits 1, 2, 4, 6, 8, 9, 10, and 11 as "Confidential" or "Highly Confidential," pursuant to the Stipulated Protective Order. Accordingly, Plaintiffs ask that the Court order these exhibits be filed under seal.

Plaintiffs also request that certain of the highlighted portions of their Memorandum of Law be filed under seal because their either quote or substantially reference portions of Exhibits 3 and 7, which have been designated "Confidential" or "Highly Confidential" by the third-parties JAB Holding Co. and Sagentia Limited ("Sagentia"), respectively. Accordingly, Plaintiffs ask that the Court order exhibits 3 and 7 be filed under seal, as well.

In making this request, Plaintiffs are not conceding that any of the information designated as confidential by KGM is in fact confidential and it reserves its rights to challenge such designations at a later date.

Respectfully Submitted,

/s/ Aldo A. Badini



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Counsel for Plaintiffs TreeHouse Foods, Inc., Bay Valley Foods, LLC, and Sturm Foods, Inc.

cc: Counsel for All Parties (via ECF and email) Enclosures (email and hand delivered versions only)